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and

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Attorneys for Recticel North America, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
DELPHI CORPORATION. et. al.,	:	Case No. 05-44481-RDD
	:	
	:	(Jointly Administered)
	:	
Debtors.	:	
	:	
	:	
-----	X	

**NOTICE OF RECLAMATION DEMAND
OF RECTICEL NORTH AMERICA, INC.**

PLEASE TAKE NOTICE that Recticel North America, Inc. ("**Recticel**"), by and through its undersigned counsel, hereby gives notice that on October 27, 2005, Recticel served written demand for reclamation of its goods, a true and correct copy of which is attached hereto at **Exhibit A** and incorporated herein by this reference. In support of its reclamation demand, Recticel states as follows:

1. On or about October 8, 2005 (the “**Petition Date**”), Delphi Corporation and certain of its subsidiaries and affiliates (collectively, the “**Debtors**”) filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”).

2. Prior to the Petition Date, Recticel manufactured certain automobile components, which included dashboard skins and glove box door skins (collectively, the “**Recticel Parts**”) on behalf of the Debtors. Recticel sold and delivered Recticel Parts in the approximate amount of \$406,930.83 to the Debtors during the period September 28, 2005 through October 7, 2005 (the “**Reclamation Period**”). The Recticel Parts were sold and delivered to the Debtors in the ordinary course of business.

3. Upon information and belief, the Debtors were insolvent during the Reclamation Period as they took delivery of the Recticel Parts. Under Section 2-702 of the Uniform Commercial Code (MCLA § 440.2702(2) as adopted in Michigan; Code of Ala. § 7-2-702 as adopted in Alabama) and Section 546(c) of the Bankruptcy Code, Recticel is entitled to recovery of the Recticel Parts delivered during the Reclamation Period from the Debtors. In the

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alternative, Recticel is entitled to an administrative expense priority claim in the amount of \$406,930.83 representing the value of the goods delivered to the Debtors. *See* 11 U.S.C. §546(c).

New York, New York
Dated: October 27, 2005

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

By: /s/ James M. Sullivan

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Counsel for Recticel North America, Inc.

EXHIBIT A

CERTIFICATE OF SERVICE

I, Mohsin N. Khambati, an attorney, hereby certify that a true and correct copy of the Notice of Reclamation of Recticel North America, Inc. was served via facsimile and/or first class United States mail, postage prepaid, on each of the following:

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Dated: October 27, 2005

/s/ Mohsin N. Khambati
Mohsin N. Khambati